



Homes for the Future: more affordable, more sustainable

Summary of Responses to the Housing Green Paper



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Ministerial foreword



House price rises over the last few years have been good news for millions of homeowners across the country. But it's a different story for first time buyers and growing families. Many are struggling to get on the property ladder, or to find a bigger home suitable for growing children. There is a fundamental mismatch between supply and demand for housing in this country, which can only be addressed by delivering more homes.

That's why housing is now a major political issue, backed by the personal commitment of the Prime Minister. And it's why we have committed to housebuilding on a scale unseen for a generation. Our plans to deliver three million new homes were set out last year in the landmark green paper, *Homes for the future: more affordable, more sustainable*.

In that green paper, we set out a comprehensive package to build better homes as well as more homes. For example, we committed to ensuring that housing helps to tackle climate change, so all new homes will be zero carbon from 2016. We emphasised the need for more affordable and more social housing. And we committed to better standards of design. All this will help to make sure that housing better reflects the needs of 21st century families.

As the summary of responses being published today shows, there is a strong consensus in favour of these principles. Many of the major housebuilders have signed up to the zero carbon housing target. Local authorities have welcomed developing their strategic housing role. Landlords and tenants alike support our emphasis on more affordable housing.

The challenge now is to make sure we turn this consensus into delivery. Already, we have seen some positive signs of change. For example, there have been more than fifty proposals to build the first eco-towns, while several local authorities are setting up the first local housing companies.

But it's time to accelerate this momentum and make sure these initial steps become giant leaps forward. Warm words and good intentions mean nothing without practical achievement. We have set out our long-term ambitions clearly. Now it is up to private developers and investors, social landlords and local authorities as well as central government to live up to our collective responsibilities. If we duck the issue, we risk letting down families and first time buyers for generations to come.

So building more homes and reaching that three million target is my first priority as housing minister. I am grateful to all those who contributed to the debate and responded to the green paper. I look forward to working with you in order to realise the ambitions we share – more homes, and better homes for families across the country.

A handwritten signature in black ink, appearing to read 'Caroline Flint', written in a cursive style.

Caroline Flint MP
Minister for Housing

Introduction

Housing Green Paper: Executive Summary

1. The Housing Green Paper, *Homes for the future: more affordable, more sustainable* was published in July 2007. It set out the Government's strategic approach to housing and offered a range of detailed proposals, based around three pillars:
 - **More homes to meet growing demand**, with a target of delivering 240,000 net additional homes a year by 2016, leading to three million additional homes by 2020.
 - **Well-designed and greener homes**, supported by the right physical and community infrastructure
 - **More affordable homes to buy or rent**, with a target of at least 70,000 more affordable homes a year by 2010-11.

2. The Government also issued a range of sister documents alongside *Homes for the future* in order to make early progress on delivering particular commitments. These provide more detail about many of the proposals in the green paper:
 - [Housing Green Paper Impact Assessment](#)
 - [Building a Greener Future: policy statement](#)
 - [Building a Greener Future: Final Regulatory Impact Assessment](#)
 - [Building Regulations: energy efficiency requirements for new dwellings a forward look at what standards may be in 2010 and 2013](#)
 - [Strategic Housing Land Availability Assessments: practice guidance](#)
 - [The Future of the Code for Sustainable Homes: making a rating mandatory¹](#)
 - [Eco-towns Prospectus](#).
 - [New Growth Points²](#).

Copies of these documents are available at www.communities.gov.uk.

¹ This was a consultation document in its own right. A [Summary of Responses](#) was published in November 2007.

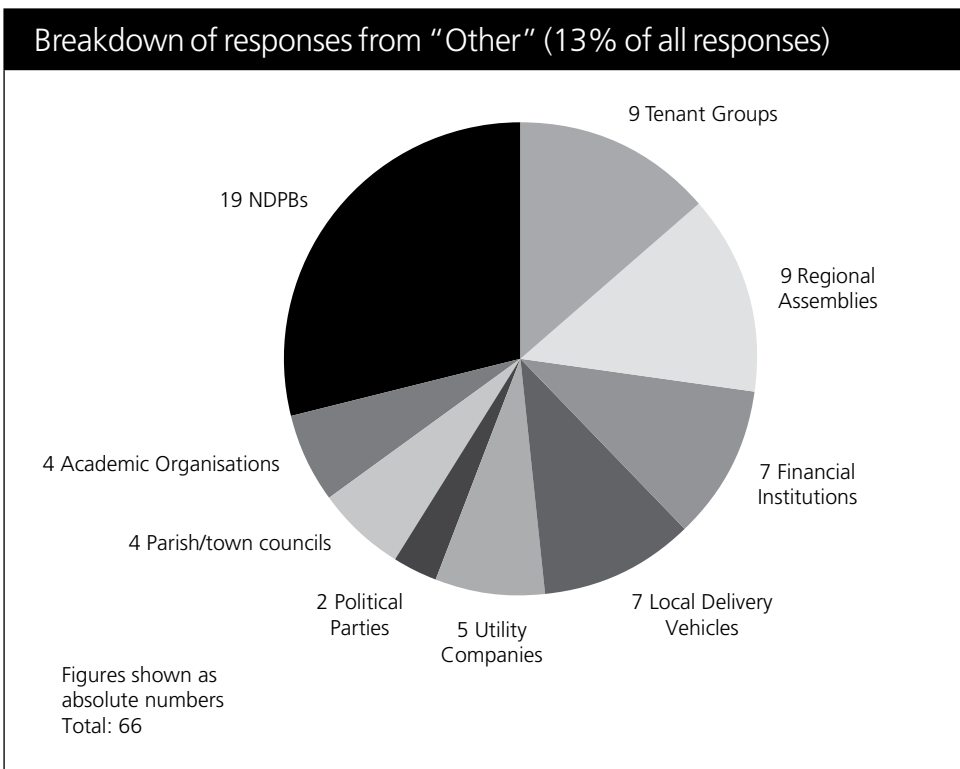
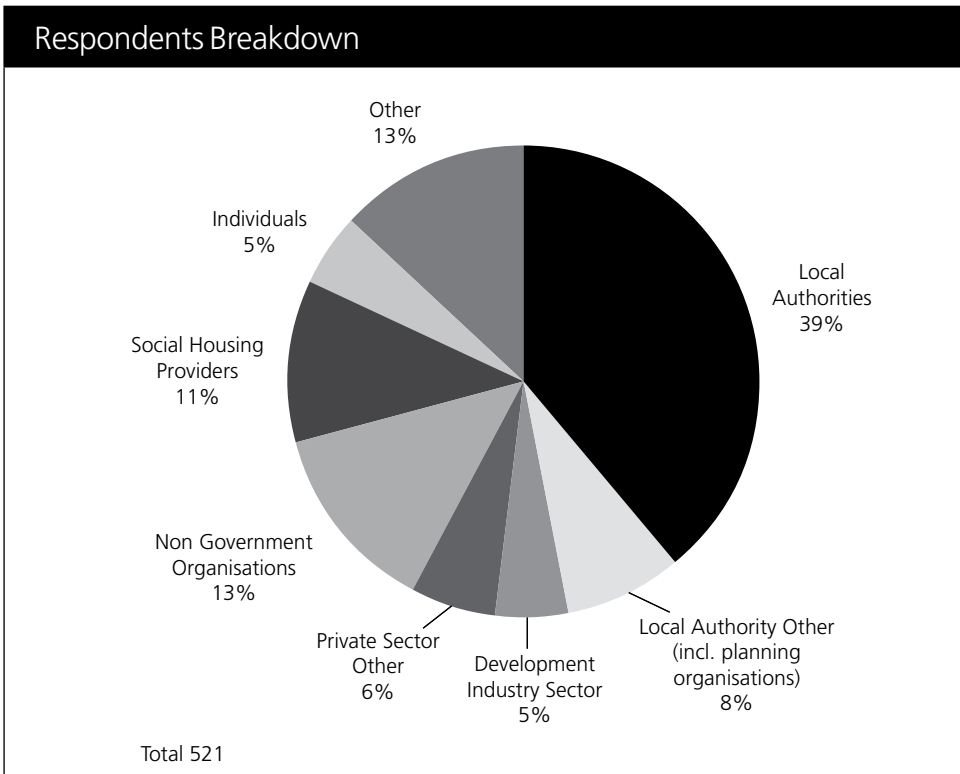
² A week after the publication of the Green paper, the Government wrote to all local authority chief executives, inviting expressions of interest in Growth Point status.

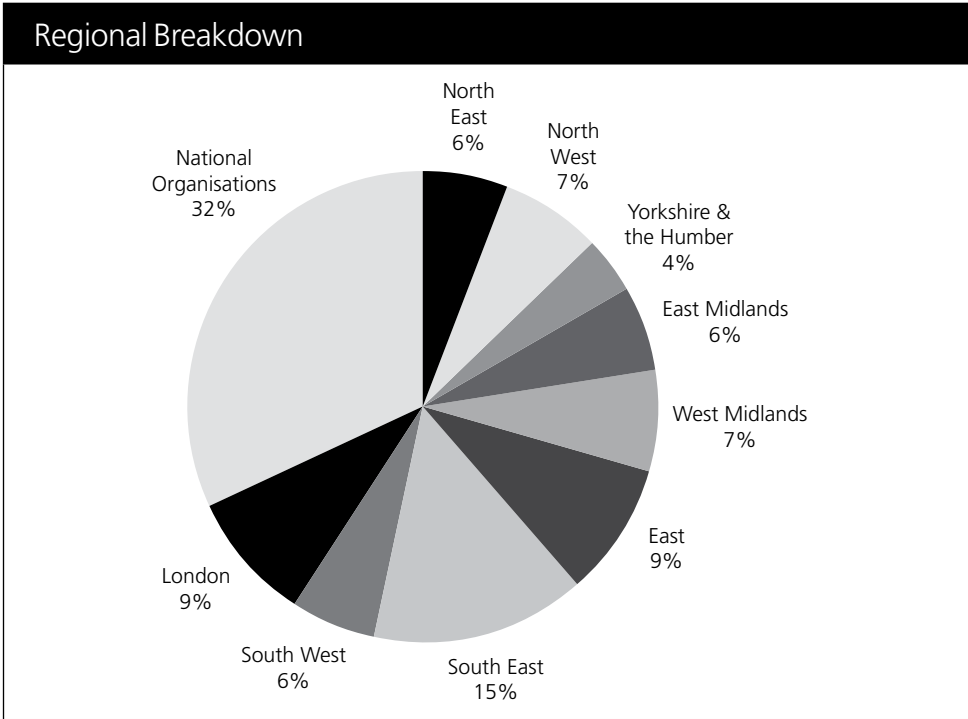
Scope of Summary of Responses

3. This document sets out a summary of responses to *Homes for the future: more affordable, more sustainable*. It also sets out what steps the Government has taken since the green paper was published, where these relate to the particular issues raised by respondents.
4. Given the breadth of policy proposals set out in the green paper and its associated documents, many responses were wide ranging and touched on several elements of the green paper. Often respondents offered general comments without linking them directly to a specific proposal or question in the green paper.
5. To best reflect the main themes emerging from the consultation, comments have been assessed against the main issues and proposals in each green paper chapter, with the level of response on particular topics given where possible. To allow ease of reference to the green paper, responses – including responses to the six specific questions set out on page 119 of the green paper – are therefore presented under the five original green paper section headings.

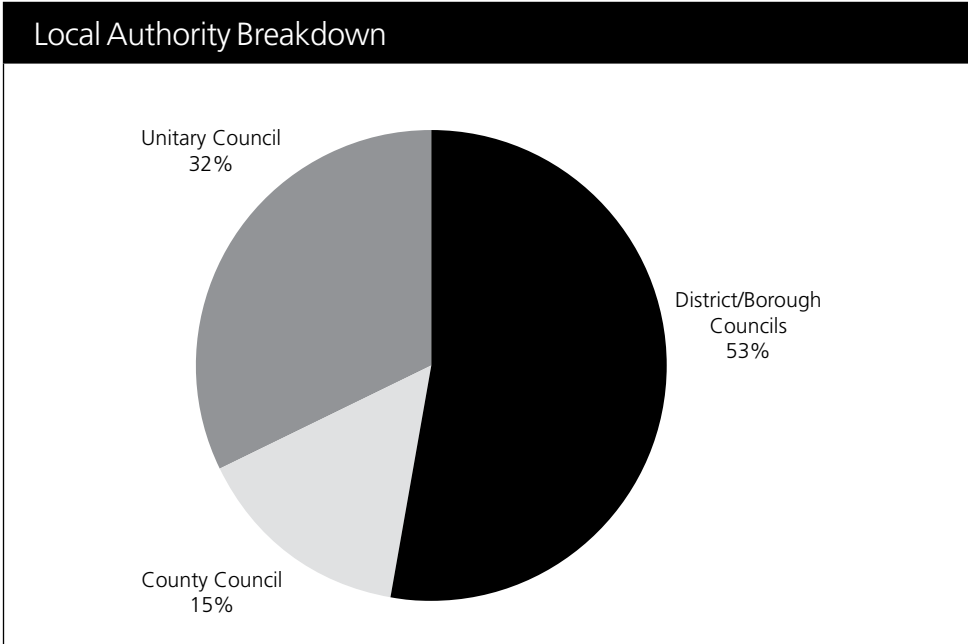
Overview of Responses

6. Five hundred and twenty one organisations and individuals responded to the green paper, the majority focusing on Sections II (More homes to meet growing demand), III (How we create places and homes that people want to live in) and IV (Making housing more affordable). Most submissions did not comment on the green paper in its entirety, but instead focused on particular areas of interest. The number of responses on any individual issue varied considerably, with some attracting comment from well over a hundred respondents.
7. The single biggest category of respondents were local authorities which, with other organisations within the local government sector such as groups of lead local policy officers, made up almost half of all responses. Another 11 percent came from social housing providers (RSLs and housing associations). The rest came from a range of different groups, including developers, non-governmental organisations (NGOs), tenant groups, private individuals and utility companies.





8. Nearly 40% of all responses came from local authorities and other locally and regionally-based organisations in London, the South East, East and South West. Almost a third of responses came from organisations with a national remit, such as national campaign groups and trade bodies.



9. Eighty-five per cent of responses from local authorities were from unitary and lower-tier authorities, which have statutory housing and planning responsibilities. These proportions broadly reflect local authority types in England (unitaries 30%, lower tier 61% and counties 9%).

Section I: progress and challenges

Section Summary

The first section of the green paper offers a summary of what has happened in the field of housing since 1997. It then outlines the challenges to be faced over the next decade to fulfil the Government's vision of ensuring that everyone has "access to a decent home at a price they can afford, in a place where they want to live and work". These challenges are to provide:

- More homes to meet growing demand
- Well-designed and greener homes
- More affordable homes to buy or rent

Consultation Responses

- 10.** The green paper was welcomed broadly, with well over 150 respondents from across the range of respondent types indicating support for its overall approach and well over 200 respondents supporting the priority given by the Government to housing. A small number of respondents raised questions about the timescale and resources needed to achieve the Government's ambition of three million homes by 2020.
- 11.** Sufficient funding for housing and growth was a key issue for many, with a large number of respondents focusing on the proposed Planning Gain Supplement and Housing & Planning Delivery Grant.
- 12.** Respondents expressed strong support for the green paper's initiatives to improve the design and environmental standards of both new and existing homes and many were in favour of the target for all new homes to be zero carbon from 2016.
- 13.** There was also strong support for the green paper's commitment to invest in more affordable housing. The green paper's proposals to make better use of existing buildings and land were another prominent item of interest. In addition, many respondents expressed support for the green paper's proposals on Local Housing Companies. These and other issues are dealt with in more detail in the following sections.

Government Position: progress to date

With our partners, the Government has taken forward a range of green paper commitments over recent months. Further detailed discussions and consultations have taken place in relation to the proposed new Community Infrastructure Levy and Housing and Planning Delivery Grant, for example, to help ensure delivery of new housing targets.

The Government has made further progress in its ambitions to reduce the environmental impact of new homes by committing to make ratings mandatory against the Code for Sustainable Homes from May 2008, as well as widening the scope of its programmes to tackle the carbon footprint of existing homes through a new Green Homes Service.³

The Government has also set out further steps to delivering more affordable homes by exploring innovative new delivery mechanisms, including developing proposals for Local Housing Companies and supporting local delivery by creating the new Homes and Communities Agency through the Housing and Regeneration Bill.

In October 2007, the Government published the [2007 Comprehensive Spending Review](#) setting out its spending proposals for the three years to 2010/11. The green paper contributed to the development of a new cross-Government Public Service Agreement to increase long term housing supply and affordability (PSA20). PSA 20 confirmed the national target to increase housing supply to 240,000 net additional homes per annum by 2016, towards an ambition of three million new homes by 2020. In addition, the PSA stated that housing “must be well designed and built in a properly planned strategic way, contributing to the Government’s sustainable development objectives”. The full PSA20 Delivery Agreement, including indicators and delivery strategy, is available at www.hm-treasury.gov.uk.

³ See the [Prime Minister’s speech](#) on climate change, 19th November 2007.

Section II: more homes to meet growing demand

Section Summary

Section II of the green paper sets out a new national commitment to deliver 240,000 additional homes per year by 2016, working towards a total of 3 million more homes by 2020.

Delivering homes where they are needed

Chapter One focuses on delivering more homes through Growth Areas, New Growth Points and Eco-Towns and measures to meet demand for new homes in rural areas.

Delivery without needless delay – continuing planning reform

Chapter Two sets out the Government's intention to speed up and improve the planning system, including through completing the current round of Regional Spatial Strategies and instigating mini-reviews of regional plans to ensure that, by 2011, plans reflect the target of 240,000 net additions per year; proposals for a new Single Regional Strategy; and new financial incentives to ensure an adequate supply of land.

Public sector land use

Chapter Three sets out measures to increase the supply of public sector land to unlock housing supply, including the supply of affordable homes, with a new target to deliver 200,000 homes on surplus public sector land by 2016.

Recycling homes and land

Chapter Four focuses on the importance of maximising the use of existing homes and previously-developed land, reaffirming the Government's commitment to a minimum 60% of new homes nationally to be built on brownfield land.

Consultation Responses

Delivering homes where they are needed

14. Around 170 respondents commented on the Government's commitment to raise housing supply. Around 80% of these supported the ambitions to increase supply as set out in the green paper. The remaining fifth – mostly local authorities and NGOs – raised questions or concerns about ensuring the provision of infrastructure necessary to support increased supply and the environmental impact of greater housing growth.

15. There was particular support for more affordable homes, with 129 respondents specifying that more were needed. Eighteen respondents expressed the view that instead of increasing overall supply as proposed in the green paper, the priority should be to deliver more affordable homes within existing planned numbers.
16. Well over 100 submissions from across the range of respondent types commented on the Government's proposals for new Eco-towns, of which over four fifths were supportive of the Government's plans. A small number of responses (16) from local authorities, NGOs and RSLs/housing associations stressed that eco-towns needed to be sustainable in terms of transport links to existing economies.
17. Housing in rural areas was of interest to many, with 98 respondents offering comments on this issue. Most of these (88) were supportive of the proposals set out in the green paper to increase the number of homes in rural areas. Ten respondents expressed concerns, particularly around the risks new development posed to the landscape and character of rural areas.

Delivery without needless delay – continuing planning reform

18. One hundred and forty one respondents commented on proposals for a new Housing and Planning Delivery Grant, with nearly 70% of responses coming from local authorities. Most welcomed the extra money but also asked questions about the level of funding to be provided and detailed allocation criteria.
19. Almost 100 respondents commented on proposals announced in the [Review of Sub-National Economic Development and Regeneration](#) to develop a Single Regional Strategy to cover economic, housing, and other planning outcomes. Of these more than 70 – half from local authorities – supported this proposal, arguing it was a sensible approach to better integrate regional priorities. Around a fifth of respondents on this topic, mostly borough and district councils and NGOs, raised questions about the reform, in particular over democratic accountability under the leadership of Regional Development Agencies.

- 20.** Over 70 respondents commented on the green paper's statement that where local authorities have not identified enough deliverable land for housing, planning inspectors will be more likely to overturn their decisions and give housing applications the go-ahead on appeal. Over two thirds raised concerns or questions about this approach in terms of democratic accountability for planning decisions. Nineteen respondents – mostly from the development industry – supported the statement.

Public sector land use

- 21.** Twenty six respondents – mostly local authorities and NGOs – commented on the proposal in the green paper to deliver 200,000 homes on public sector land. Of these, 21 supported the proposal, the other five raising concerns around the implications of the release of public sector land for housing in their local area.

Recycling homes and land

- 22.** There was a consensus around the need to do more to recycle land and properties. Almost 100 respondents argued that there is a need to do more to bring empty properties back into use. Around half of these came from housing and planning authorities, with another fifth from a range of NGOs, including charities and environmental groups.
- 23.** One hundred respondents called for a continued focus on delivering additional homes on brownfield land. Of these, 43 came from local authorities, 18 from non-governmental organisations and the rest from a range of stakeholders, including seven developers and five social housing providers. Around a quarter of all those commenting on the use of brownfield land came from the South East.
- 24.** Eleven respondents considered the target that 60% of homes should be built on brownfield land to be unachievable and another 18 felt there were difficulties in achieving it.

Government Position

Delivering homes where they are needed

Since the publication of the green paper, the Government has received over 50 expressions of interest from developers and local authorities interested in Eco-towns. In addition, the Government has received around 30 applications for the additional round of New Growth Points. These are now being assessed across Government and its agencies. We will consult shortly about selected locations.

In September 2007, the Prime Minister appointed Matthew Taylor MP to conduct an independent review to advise Government on planning and land use to support sustainable rural communities, including the provision of affordable rural homes. The review will report to the Minister for Housing and the Secretary of State for Environment, Food and Rural Affairs around July 2008.

The Government has announced a new target for rural affordable housing delivery over the 2008-11 period, based on advice on delivery from the Housing Corporation and the Regional Assemblies.

Delivery without needless delay – continuing planning reform

The Government published detailed proposals on the allocation arrangements for the Housing and Planning Delivery Grant (HPDG) for consultation in October 2007, which closed on 17th January 2008. The Government is currently considering the consultation responses received.

Proposals for a Single Regional Strategy were set out in the [Review of Sub National Economic Development and Regeneration](#), published in July 2007 and the Government will publish detailed proposals for consultation shortly.

On the issue of identifying land for housing, the Government remains committed to the approach set out in PPS3 and the green paper. As stated in the green paper, we want to build homes more quickly by unblocking the planning system and releasing land for development.

Public sector land use

Since the green paper, Government Departments have worked with English Partnerships to assess the status and suitability of over 900 individual sites. This initial assessment has identified 174 sites with housing potential for around 35,000 homes including Connaught Barracks in Dover and the former police training college in Bruche. Work is continuing to identify and bring forward further surplus public sector sites.

Recycling homes and land

The Government is currently finalising a detailed response to English Partnerships' recommendations for a [National Brownfield Strategy](#), and will issue this shortly.

Section III: How we create places and homes that people want to live in

This section of the green paper concentrates on ensuring that in the future additional homes are also *better and greener*.

Infrastructure

Chapter Five underlines the Government's commitment to ensure new homes are supported by the right infrastructure to provide for vibrant and sustainable communities. It sets out proposals for better coordination across Government departments to support the provision of infrastructure and proposals for new sources of central and local funding.

Well designed homes and places

Chapter Six recognises the importance of better design to ensure the provision of well-designed homes for all forms of households in the community, including young families and older people. Two of the six specific consultation questions at the end of the green paper relate to Chapter six.

Greener homes

Chapter Seven focuses on the importance of greener homes, making sure that both new as well as existing homes make more of a contribution towards a better environment, including improved water efficiency and lower carbon emissions from housing. It confirms that all new homes should be built to zero-carbon standards from 2016.

Consultation Responses

Infrastructure

- 25.** Over 100 responses welcomed the level of investment announced in the green paper to support the provision of infrastructure. Twenty six respondents expressed the view that Government should plan for funding on a longer-term basis than the three years of a spending review period.
- 26.** Thirty seven respondents expressed support for the green paper's proposal that the Planning Inspectorate should consider the demonstration of infrastructure availability and planning as part of the test of soundness of a development plan document.

27. A small number of respondents raised concerns about the infrastructure provision necessary to ensure that eco-towns are sustainable, for example in terms of adequate employment opportunities and transport links.
28. More than 100 responses offered comments on the Government's proposal for a Planning-gain Supplement and the alternative approaches set out in the green paper. Some of these expressed support for the Government's original proposal for PGS, but others raised questions around implementation, in particular the valuation process. As highlighted in the green paper, Government has been carrying out further detailed discussions on this issue with key stakeholders.

Well designed homes and places

29. A strong theme emerging from responses to this chapter was support for the green paper's proposals for higher design. Over 130 responses argued for the need for better design of new homes, and of these many emphasised better design to provide for the requirements of families (71 responses), older people (62) and people with special needs (56).
30. The green paper posed two specific questions on design issues:
 - **Do you consider that any additional tools and/or mechanisms are now needed to deliver the design policies in order to achieve our aspirations for an up-lift in quality and to improve inclusive design?**

There were a total of 69 responses to this question, with a large majority (57) supporting the idea that additional tools could be introduced to improve design. Respondents suggested a range of additional measures, which included updating building regulations, the use of characterisation studies, the introduction of space standards and fiscal incentives. Others emphasised measures noted elsewhere in the green paper, such as Building for Life and Lifetime Homes standards.
 - **Do you agree that further work to explore and evaluate quality assurance approaches would be worthwhile?**

There were 78 responses to this question, of which 72 supported this suggestion.

Greener homes

31. Over 160 respondents supported the green paper's call for new homes to be greener, working towards the target that new homes should be built to zero-carbon standards from 2016. Almost a hundred respondents expressly supported the use of the Code for Sustainable Homes as a tool to achieve this.

- 32.** Almost 120 responses called for more to be done to make existing homes greener. Around half of these responses were from Local Authorities and the rest were made up of a wide cross section of respondents, including developers, design and environmental groups, charities and housing and planning professional umbrella groups.

Government Position

Infrastructure

The [2007 Comprehensive Spending Review](#) announced an extra £1.4bn for infrastructure for Growth Areas, the Thames Gateway, New Growth Points and Eco-towns. This is in addition to the £300m Community Infrastructure Fund announced in the green paper.

The Government has taken forward the proposal to review the test of soundness for development plan documents through a consultation on revised [Planning Policy Statement: Local Development Frameworks \(PPS12\)](#), which closed on 19 February. The proposed tests would centre around the justification and effectiveness of the policies in a plan, including infrastructure planned to support development. The government aims to publish the revised PPS12 in the spring.

The [PSA20 Delivery Agreement](#), published as part of the 2007 Pre-Budget Report and Comprehensive Spending Review set out in detail the responsibilities of Government departments to deliver the infrastructure needed to support well designed homes and places. As set out in the Delivery Agreement, Communities and Local Government is currently working with Departments to support delivery of infrastructure through a process of bilateral three-month reviews.

Following detailed discussions with key stakeholders, the Government announced at the [2007 Pre-Budget Report](#) that it would not introduce legislation for PGS in this Parliamentary Session but would instead legislate for a new planning charge. The Planning Bill, currently going through Parliament, will allow the Secretary of State to empower local authorities to charge a Community Infrastructure Levy (CIL) on new developments to support infrastructure delivery. Subject to Parliamentary decisions, we will consult formally on the draft CIL Regulations in autumn 2008, with a view to finalising them in spring 2009.

Well designed homes and places

To support better design, Communities and Local Government is working with DCMS on the 'light touch' review of CABE, which we aim to publish this in the summer.⁴ We have initiated work on a Design Quality Assurance pilot scheme, which aims to encourage developers to invest more time in design early on in the development process. In addition, entries for the annual Housing Design Awards are currently being invited to showcase the very best designs.

⁴For background, see [Homes for the future](#), p63.

Government Position (*continued*)

The Government has published a new [housing strategy for an ageing society](#) which responds to stakeholder's views on this issue in some detail, including on the benefits of building to the Lifetime Homes Standards.

Greener homes

The UK Green Building Council is currently exploring the scope and role of a delivery vehicle to facilitate progress towards the [2016 zero-carbon homes target](#). From May 2008 all new homes will need to be rated – not assessed - against the Code for Sustainable Homes. More information can be found at www.communities.gov.uk/thecode.

To improve the environmental performance of existing homes the Government will launch the Green Homes Service in April 2008. The service will provide a one-stop shop for consumers, offering free and impartial advice on energy efficiency, water, waste, microgeneration and low carbon transport, and provide easy access to the full range of discounted and free offers available.

Earlier this month, Defra published a [water strategy for England](#). This set a vision to 2030 for more efficient water consumption and improved surface water management.

Section IV: Making housing more affordable

This section of the green paper focuses on delivering more affordable housing to buy and rent, including in rural areas, particularly for first time buyers. It announces at least £8 billion investment over three years, an increase of 50% on current levels. It also sets out a new target of 70,000 affordable homes a year by 2010-11, including at least 45,000 social homes for rent.

More Social Housing

Chapter Eight sets out a range of measures to deliver on the new affordable homes targets, including proposals to reform the Housing Revenue Account, continued support for the Decent Homes programme and proposals to deliver additional shared ownership homes through new Local Housing Companies. Two of the six specific consultation questions set out in the green paper (see p119) relate to Chapter Eight.

Helping first time buyers

Chapter Nine sets out a number of measures to help people make their first step on to the housing ladder. Specific proposals include additional shared ownership homes on public sector land, increased opportunities for social tenants to purchase a share in their own home, an expansion of Open Market HomeBuy products and more flexibility for councils and ALMOs to build homes on council land.

Improving the way the mortgage market works

Chapter Ten announces a consultation on new legislative proposals for a covered bonds regime to help assist mortgage firms finance more affordable longer-term fixed-rate mortgages, support for a Private Member's Bill allowing building societies more flexibility in financing their mortgages and a review to identify any further barriers to lenders wanting to raise funds in wholesale markets.

Consultation Responses

More Social Housing

- 33.** The vast majority of comments on this section of the green paper concentrated on Chapter Eight. Key issues respondents raised in this section were the provision of more affordable housing, particularly in rural areas, and more flexibility over local authority funding for, and building of, social housing.

- 34.** There was widespread support for the green paper’s commitment to invest in more affordable housing. One hundred and twenty nine respondents supported the need to increase the supply of affordable homes (none expressed dissenting opinions). Eighty five respondents welcomed the announcement of £8 billion investment to help deliver these homes, whilst 20 respondents felt further investment was needed to reach the new delivery targets.
- 35.** Over eighty respondents – mostly local authorities, social housing providers and NGOs – agreed on the need to increase the supply of social housing. One theme to emerge was a concern that wider affordability pressures can impact on the affordability of shared ownership products.
- 36.** Many respondents commented on delivery arrangements for increasing the supply of affordable housing. There were two specific questions on this issue:
- **What are your views on our proposals to allow councils to retain the full rental income from, and capital receipts on disposal of, additional new properties financed from local resources and consult on detailed options?**
 Around 60 respondents supported radical reform or the ending of the Housing Revenue Account subsidy system, in part to allow local authorities to become self financing. Half of this support came from local authorities, the rest from social housing providers. This view was particularly pronounced among responses from London. There was a similar level of agreement among local authorities to allow them to retain rental income and capital receipts from new supply with 96% of responses on this topic expressing support.
 - **What are your views on our proposals to change the pooling regime for receipts from shared equity schemes that local authorities develop and consult further on any detailed proposals?**
 There were 41 responses to this question, all of which were in favour of changing the current pooling regime, with eight welcoming the opportunity to be consulted on any future proposals.
- 37.** Almost 120 respondents argued that other aspects of housing policy besides supply should continue to be prioritised, including programmes such as Supporting People and the Disabled Facilities Grant. The vast majority of these respondents were local authorities (54), NGOs (23) and social housing providers (16). Sixty four respondents specifically supported the green paper’s continued commitment to investment in the Decent Homes programme.

Helping first time buyers

- 38.** Relatively few respondents offered views on the proposals in Chapter Nine on helping first time buyers. Eight respondents had concerns that the Green paper's proposals for 50% affordable housing target on public sector land would reduce the value of land and might not support sustainable, mixed communities.

Improving the way the mortgage market works

- 39.** Relatively few respondents commented on the proposals in Chapter Ten on improving the way the mortgage market works. Around 30 respondents expressed support for effective regulation of market lenders, particularly on the issue of the willingness of some lenders to offer high loan-to-value mortgages. Fourteen respondents commented on the potential for longer-term fixed mortgages, 13 of whom expressed support.

Government Position

More Social Housing

The Housing & Regeneration Bill, currently making its way through Parliament, provides for measures to exclude some or all of a local authority's housing stock from the Housing Revenue Account subsidy system. Agreements covering future properties will enable those local authorities to keep the full rental income from new housing supply.

In December 2007 ministers announced a [review of the HRA subsidy system](#). Its aim is to establish a long-term, sustainable system for financing council housing which enables councils to plan effectively for the future. We expect the review to conclude in spring 2009.

Helping first time buyers

To help first time buyers get a foot on the housing ladder we are committed to delivering 25,000 shared ownership and shared equity homes a year by 2009 through our HomeBuy and other programmes.

In December 2007 ministers announced that Social HomeBuy would continue as a voluntary scheme when the pilot period ends in March 2008 to increase opportunities for social housing tenants to access home ownership. We are encouraging landlords to improve affordability for purchasers and develop an option where maintenance costs are shared.

The review of the HRA subsidy system will cover local authorities' concerns on the effect of Social HomeBuy on their accounts.

Improving the way the mortgage market works

Improving efficiency in mortgage funding markets is key to lowering mortgage costs and delivering affordable mortgages suited to borrowers' needs. As set out in the Chancellor's 2007 Pre-Budget Report the housing finance review launched last year has held discussions with mortgage lenders, investment banks, regulators, consumer groups and academics and will report at Budget 2008.

Section V: Delivery – how we make it happen

Section Summary

This Section sets out the Government’s proposals to build capacity to meet construction and skills challenges and underlines the importance of partners in all sectors in delivering on the green paper agenda.

Skills and Construction

Chapter Eleven focuses on the need to increase the capacity and capability of the key sectors supporting housing growth. It sets out proposals for greater public-private cooperation to raise skills and improve recruitment and retention, for example by developing more apprenticeships and new diplomas for young people.

Implementation: a shared endeavour

Chapter Twelve underlines the respective roles and responsibilities of all the public, private and third sector organisations required to deliver on the green paper’s ambitions. It emphasises the role of local leadership and partnership working through Local Delivery Vehicles and other innovative delivery models in the context of a “shared endeavour” to deliver the homes that communities need. Two of the six specific consultation questions set out in the green paper relate to Chapter 12.

Consultation Responses

- 40.** There were fewer responses to this section than the three preceding sections. Among the responses received, interest was focused most on industry capacity to deliver more homes, integrating housing into Local Area Agreements (LAAs) and doing more to address concerns around land banking.

Skills and Construction

- 41.** Many respondents focused on the issue of industry capacity to deliver the quantity and quality of homes set out in the green paper. Ninety responses expressed the view that more needs to be done to increase the capacity and skills across sectors if national targets are to be met. Just under half of these responses (40) came from local authorities, the rest coming from a wide range of stakeholders including NGOs (13), social housing providers (10) and developers (5).

Implementation: a shared endeavour

- 42.** Forty seven respondents highlighted Local Area Agreements (LAAs) as an important means of helping to prioritise housing delivery at the local level and supported the integration of housing targets in the negotiation of new LAAs arising from the Local Government and Public Involvement in Health Act (2007).
- 43.** A smaller number of responses (33) addressed the issue of alleged land banking by developers, most being local authorities, social housing providers and non-governmental organisations. Many of these felt land banking was a barrier to delivery.
- 44.** There were two specific questions in the green paper relating to the delivery models set out in Chapter 12:
- **What are your views on the strengths of the models for delivering new supply set out in chapter 12?**
 - **Are there other models you know of which could effectively secure the outcomes sought?**
- 45.** Eighty-five respondents from across the country selected the Green paper's proposal for Local Housing Companies (LHCs) as an issue of interest. The vast majority (70) supported the Green paper's proposal to create these as new housing delivery vehicles. Around two thirds of these supportive comments came from local authorities.
- 46.** About 30 respondents noted the suitability of LHCs to be tailored to local circumstances. Fifteen expressed a desire that LHCs should not be overburdened with bureaucracy or central control. Thirty five respondents welcomed the green paper proposal to provide support for councils interested in creating LHCs, with several stressing the importance of non-prescriptive guidance and practical support.
- 47.** Many of the comments from local authorities or their representative bodies favoured enabling councils to build new social homes for rent. Across sectors, the balance of opinion remained in support of council new build, but a large minority believe that Registered Social Landlords are now the best providers of new build social housing and see the proper role for the local authority as that of strategic partner. Among supporters of local authority new build, many expressed concern that they lacked skills and experience and that these would take time to rebuild.

- 48.** There was broad support for ALMOs to be involved in new build, and the proposal to extend eligibility for social housing grant to 2 star ALMOs was generally welcomed. Some pointed out that ALMOs faced additional problems with stamp duty land tax, corporation tax, VAT and public borrowing rules when compared to RSLs, making it harder to compete for funding.
- 49.** A small number of respondents (18) expressed support for more use of Local Delivery Vehicles as an effective means of delivering new homes. A larger number (38) expressed support for the green paper's proposals on Community Land Trust pilots. There was limited comment on other delivery models, such as Limited Liability Partnerships, Single Estate Transformation and Strategic Housing and Regeneration Partnerships.

Government Position

John Callcutt published his [Review of Housebuilding Delivery](#) on 22 November 2007. He concluded that, subject to his recommendations, the industry and its supply chain does have the capacity to meet the Government's housing ambitions. Government will publish a response to the review in the spring.

On 28th January the Prime Minister announced [additional measures](#) to boost the skills base of the housing and wider construction industry. More than 1,000 construction companies – with over 60,000 employees between them – have now signed up to the Government's [Skills Pledge](#), making construction the leading sector in demonstrating commitment to training.

Detailed discussions are currently underway between English Partnerships and fourteen local authorities that have expressed an interest in piloting Local Housing Companies (LHCs). We expect to announce the first LHCs later this year.

On Community Land Trusts, the Housing Corporation is currently supporting Salford University's Community Land Trust pilots. The University will publish their report on the pilots and recommendations at the end of April 2008.

Government and local areas are currently in discussions to agree [new Local Area Agreements](#), which offer new scope for integrating housing into local priorities. We expect the new LAAs to be agreed in June 2008.

Note on Responses

- 50.** The green paper was sent to the Chief Executives and lead officers for housing and planning in all local authorities, as well as a wide range of major regional and national stakeholders, including professional bodies, academic and research institutions, charities and industry representatives.
- 51.** Responses were invited on the range of ideas and proposals contained in the green paper. Comments were particularly welcomed on Chapter Six, *Well designed homes and places* and Chapter 8, *More social Housing*.
- 52.** Following its launch, the green paper was supported by a range of conferences, workshops and seminars throughout the consultation period, attended by ministers and officials.
- 53.** *Homes for the future*, the documents published alongside it, plus this Summary of Responses, are available at www.communities.gov.uk.

Annex A: Related Documents

Over recent months the Government has published a number of related policy documents that further develop the proposals in the *Homes for the future*. All of these are available via www.communities.gov.uk.

| | Policy Document | Green paper reference |
|-----|--|------------------------------|
| 1. | PSA Delivery Agreement 20: increase long term housing supply and affordability | Chapter 1, <i>inter alia</i> |
| 2. | Housing and Planning Delivery Grant: consultation on allocation mechanism | P8, p20 |
| 3. | Planning Policy Statement: Planning and Climate Change | Chapter 7 |
| 4. | Designing green towns of the future (Eco-towns design competition) | Chapter 7 |
| 5. | The Planning Bill | Chapter 2 |
| 6. | Streamlining Local Development Frameworks: Consultation (replacing PPS12) | P51 |
| 7. | Housing and Regeneration Bill | Chapter 8, <i>inter alia</i> |
| 8. | The Callcutt Review of housebuilding delivery | Chapters 11 and 12 |
| 9. | Frequently asked questions about Eco-towns | pp26-27 |
| 10. | Enhanced role for National Housing and Planning Advice Unit | p31 |
| 11. | The Thames Gateway Delivery Plan | p22, <i>inter alia</i> |
| 12. | National Brownfield Strategy | Chapter 4 |
| 13. | Towards Lifetime Neighbourhoods: Designing sustainable communities for all. A discussion paper | p59 |
| 14. | The Community Infrastructure Levy | pp54-56 |
| 15. | Delivering Housing and Regeneration: Communities England and the future of social housing regulation – Consultation – Summary of Responses | p73 |
| 16. | Shared Ownership and Leasehold Enfranchisement: Response to Consultation | Chapter 9 |
| 17. | New partnership to help deliver London homes | Chapter 1 |
| 18. | Water Strategy – <i>Water Future</i> | p68 |
| 19. | Surface Water Drainage – a consultation paper | p68 |

Annex B: Abbreviations

| | |
|-------|--|
| ALMO | Arms Length Management Organisation |
| CABE | Commission on Architecture and the Built Environment |
| CIL | Community Infrastructure Levy |
| CLT | Community Land Trusts |
| CSR07 | 2007 Comprehensive Spending Review |
| HA | Housing Association |
| HCA | Homes and Communities Agency |
| HPDG | Housing and Planning Delivery Grant |
| LAAs | Local Area Agreements |
| LDV | Local Delivery Vehicle |
| LHC | Local Housing Company |
| NDPB | Non Governmental Public Body |
| NGO | Non-governmental organisation |
| PGS | Planning Gain Supplement |
| PSA | Public Service Agreement |
| RSL | Registered Social Landlord |

Annex C: List of Respondents

1. Aberdeen City Council
2. Aberdeenshire Council
3. Academy for Sustainable Communities
4. Adur District Council
5. Affinity Sutton Group
6. Age Concern
7. Airport Operators Association (AOA)
8. Albury Concerned Residents
9. All Party Parliamentary Group on Housing Co-operatives and Residents Control
10. Allerdale Borough Council
11. Anchor Trust
12. Arnold White Estates
13. Arts Council England
14. Asset Skills
15. Association for Public Service Excellence
16. Association for the Conservation of Energy
17. Association of Greater Manchester Authorities
18. Association of London Borough Planning Officers
19. Association of Mortgage Intermediaries (AMI)
20. Association of North East Councils
21. Aster Group Ltd
22. Audit Commission
23. Aylesbury Vale Advantage
24. Aylesbury Vale District Council
25. B.Line Housing Information Ltd
26. Banks Group
27. Barnardos
28. Barnsley Metropolitan Borough Council
29. Basingstoke & Deane Borough Council
30. Bassetlaw District Council
31. Bat Conservation Trust
32. Bathroom Manufacturers Association
33. Bedfordshire Councils' Planning Consortium
34. Bedfordshire County Council
35. Bee Bee Developments
36. Berkeley Group plc
37. Bioregional Development Group
38. Blackburn with Darwen Borough Council
39. Bolton Metropolitan Borough Council
40. Bournemouth Borough Council
41. Bradford Community Housing Trust
42. Bradford Council & Housing Group
43. Brentwood Borough Council
44. Bridging Newcastle Gateshead

45. Brighton and Hove City Council
46. Bristol City Council
47. British Flue & Chimney Manufacturers' Association (BFCMA)
48. British Heart Foundation
49. British Property Federation
50. British Ready Mixed Concrete Association
51. British Woodworking Federation
52. Broadland District Council
53. Broxbourne Borough Council
54. Broxtowe Borough Council
55. Building Societies Association
56. Bury Metropolitan Borough Council
57. Calderdale Metropolitan Borough Council
58. Calor Gas Ltd
59. Cambridge Sub-Regional Housing Board
60. Cambridge University Hospitals NHS Foundation Trust
61. Cambridgeshire County Council
62. Camden Federation of Tenants and Residents Association
63. Campaign to Protect Rural England – CPRE (Kent)
64. Campaign to Protect Rural England – CPRE (National)
65. Campaign to Protect Rural England – CPRE (Surrey)
66. Campaign to Protect Rural England – CPRE (Wiltshire)
67. Canterbury City Council
68. Castle Morpeth Borough Council
69. CDS Co-operatives
70. Central Lancashire Local Authorities
71. Centre 404
72. Chartered Institute of Water and Environmental Management
73. Chelmsford Borough Council
74. Cheltenham Borough Council
75. Cherwell District Council
76. Cheshire County Council
77. Chester City Council
78. Chester Civic Trust
79. Chesterfield Borough Council
80. Chichester District Council
81. Chiltern District Council
82. Chilterns Conservation Board
83. Circle Anglia
84. City of London Corporation
85. City of York Council
86. CityLife Group
87. CityWest Homes
88. Civic Trust
89. Colchester Borough Council
90. Commission for Architecture and the Built Environment (CABE)
91. Commission for Rural Communities
92. Communication Workers Union

93. Community and Regional Planning Services
94. Community Housing Cymru/Cartrefi Cymunedol
95. Concrete Centre
96. Convention of Scottish Local Authorities – COSLA
97. Corby Borough Council
98. Core Cities Group
99. Cornwall County Council
100. Council House Group of MPs
101. Council of Mortgage Lenders
102. Councils with ALMOs Group
103. Country Land & Business Associates Ltd
104. Countryside Properties plc
105. Coventry City Council
106. Cranfield Parish Council
107. Crawley Borough Council
108. Creekside Forum
109. Crigglestone Parish Council
110. Cross Key Homes
111. Cumbria County Council
112. Dacorum Tenants and Leaseholders
113. Dale & Valley Homes
114. Digital Access Provision (DAP) Forum
115. Defend Council Housing
116. Derby City Council
117. Derby Homes Ltd
118. Developer Consortia
119. Dever Society
120. Devon County Council
121. Dorset Community Action
122. Dorset County Council
123. Droitwich Spa Town Council
124. Dudley Metropolitan Borough Council
125. Durham County Council
126. East Hampshire District Council
127. East Hertfordshire District Council
128. East London Housing Partnership
129. East Midlands Regional Assembly
130. East of England Regional Assembly
131. East of England Regional Development Agency
132. East Riding Affordable Rural Housing Project
133. East Riding of Yorkshire Council
134. East Sussex County Council
135. East Thames Group
136. Eastleigh Borough Council
137. EDF Energy
138. Elderflowers Projects Company Ltd
139. Elevate East Lancashire
140. Ellesmere Port and Neston Borough Council

141. English Heritage
142. English National Park Authorities Association
143. Environment Agency
144. Erewash Borough Council
145. European Policy Consultants on Rural Development and Renewable Energy (Enrinco)
146. Federation of Master Builders
147. Federation of Northumberland Development Trusts
148. Flagship Housing Trust
149. Forest Heath District Council
150. Forestry Commission
151. Foundations
152. Gateshead Housing Company
153. Gateshead Metropolitan Borough Council
154. Gelding Borough Council
155. Genesis Housing Group
156. Gentoo Group
157. Genworth Financial
158. Gloucester City Council
159. Gloucestershire County Council
160. Grasslands Trust
161. Gravesham Borough Council
162. Great Yarmouth Borough Council
163. Greater Haven Gateway Housing Sub-Region
164. Greater London Authority
165. Greater Norwich sub-region
166. Grunden Consulting
167. Guildford Borough Council
168. Halton Borough Council
169. Hampshire County Council
170. Harborough District Council
171. Harlow District Council
172. Havant Borough Council
173. Havebury Housing Partnership
174. HBOS plc
175. Heating Equipment Testing and Approval Scheme
176. Hertfordshire Association of Parish and Town Councils
177. Hertfordshire County Council
178. HETAS
179. Hives Planning
180. Home Builders Federation Ltd
181. HOME Group
182. Hounslow Homes Ltd
183. House Builders Association
184. Housing Forum
185. Housing Justice
186. Housing Solutions Group
187. Housing21

188. Housing Quality Network (HQN) Associates
189. Hull City Council
190. Humberstone Village Community Forum
191. Hyde Housing Association
192. Institute of Historic Building Conservation
193. Ipswich Borough Council
194. Isle of Wight Area of Outstanding Natural Beauty Partnership
195. John Grooms Housing Association
196. John Laing Investments Ltd
197. Joseph Rowntree Foundation
198. Keep Wimborne Green
199. Kensington and Chelsea Tenants Management Organisation
200. Kent County Council
201. Kent Green Party
202. Kier Group plc
203. Kirkless Strategic Housing Services
204. Lakeland Guild Construction Co Ltd
205. Landscape Institute
206. Law Society of Scotland
207. Lawrence Graham Solicitors
208. Leeds City Council
209. Leeds Housing Partnership
210. Leicester City Council
211. Leicestershire County Council
212. Lewes District Council
213. Lincoln City Council
214. Lincolnshire County Council
215. Lincolnshire Rural Housing Association
216. Linfoot Homes Ltd
217. Liverpool City Council
218. Living Countryside
219. Local Government Association
220. London and Quadrant Group
221. London Borough of Barnet
222. London Borough of Brent
223. London Borough of Bromley
224. London Borough of Camden
225. London Borough of Croydon
226. London Borough of Enfield
227. London Borough of Greenwich
228. London Borough of Hackney
229. London Borough of Haringey
230. London Borough of Havering
231. London Borough of Hillingdon
232. London Borough of Lambeth
233. London Borough of Lewisham
234. London Borough of Newham
235. London Borough of Richmond Upon Thames

236. London Borough of Southwark
237. London Borough of Sutton
238. London Borough of Tower Hamlets
239. London Commuter Belt Sub Region
240. London Councils
241. London First
242. London New Deal for Communities Partnerships
243. London Royal Borough of Kensington and Chelsea
244. London School of Economics
245. London Sustainable Development Commission
246. London Tenants Federation
247. London Thames Gateway Development Corporation
248. Look Ahead Housing Care
249. Luton Borough Council
250. Mace Housing Co-Operative
251. Maidstone Borough Council
252. Maldon District Council
253. Manchester City Council
254. Manchester Salford Pathfinder
255. Martlesham Parish Council
256. Melton Borough Council
257. Merseyside Residents Network
258. Mid Devon District Council
259. Mid Suffolk District Council
260. Middlesbrough Borough Council
261. Midland Heart
262. Miller Homes Ltd
263. Milton Keynes Borough Council
264. Milton Keynes South Midland Group
265. Milton Keynes South Midlands Infrastructure Funding Group
266. MLA Partnership
267. Museums Libraries Archives, South East
268. National Assembly of Women
269. National Association of Empty Homes
270. National Communities Resource Centre
271. National Council of Women of Great Britain
272. National Federation of ALMOs
273. National Grid Property (Holdings) Ltd
274. National Heart Forum
275. National House Building Council
276. National Houses in Multiple Occupation Lobby
277. National Housing and Planning Advice Unit (NHPAU)
278. National Housing Federation
279. National Housing Forum
280. National Industrial Symbiosis Programme (NISP)
281. National Organisation of Residents Associations
282. National Tenant Associations
283. Natural England

284. New Forest District Council
285. New Heartlands Pathfinder
286. Newark and Sherwood District Council
287. Newcastle City Council
288. Newcastle Tenants Federation
289. Norfolk County Council
290. North Dorset District Council
291. North East Older Peoples Advisory Group
292. North East Regional Assembly
293. North Kesteven District Council
294. North Norfolk District Council
295. North Northants Development Company (NNDC)
296. North Shropshire District Council
297. North Star Housing Group
298. North Tyneside District Council
299. North West Housing Forum
300. North West Leicestershire District Council
301. North West Regional Assembly
302. North Yorkshire County Council
303. Northampton Borough Council
304. Northampton County Council
305. Northamptonshire County Council
306. Northern Housing Consortium
307. Northern Network of Rural Housing Enablers
308. Northern Way
309. Northgate Information Solutions
310. Northumberland County Council
311. Northumberland Housing Board
312. Norwich City Council
313. Nottingham City Council
314. Nottinghamshire County Council
315. Oil Firing Technical Association
316. Oldham Metropolitan Borough Council
317. One North East – Regional Development Agency
318. Orwell Housing Association Ltd
319. Oxfordshire County Council
320. Oxfordshire Housing Partnership
321. Papworth Trust
322. Partnership for Urban South Hampshire
323. Paul Sharpe Associates
324. Peabody Trust
325. Pendle Borough Council
326. Persimmon Special Projects Western
327. Places for People
328. Planning Aid for London
329. Planning Inspectorate
330. Planning Officers Society
331. PLUS Housing Group

332. Policy Research Institute on Ageing & Ethnicity
333. Poole Borough Council
334. Portsmouth City Council
335. PPP Forum Tax Committee
336. PRP Architects
337. PRUPIM
338. Public and Commercial Services Union (PCS)
339. Purbeck District Council
340. Regenter
341. Regional City East
342. Renewable Energy Association
343. Residential Landlords Association
344. Retirement Housing group
345. Riverside Group
346. Rochdale Metropolitan Borough Council
347. Rochford District Council
348. Roofkrete Ltd
349. Ropemaker Properties Ltd
350. Rother District Council
351. Rotherham Metropolitan Borough Council
352. Royal Association for Disability and Rehabilitation
353. Royal Borough of Windsor and Maidenhead
354. Royal British Legion
355. Royal Institute of British Architect (RIBA)
356. Royal Institute of Chartered Surveyors (RICS)
357. Royal Society for the Protection of Birds (RSPB)
358. Surrey Rural Housing Partnership
359. Rushmoor Borough Council
360. Salford City Council
361. Sanctuary Housing
362. Scottish Estates Business Group
363. Scottish Rural Property and Business Association
364. Seaford Town Council
365. Sefton Metropolitan Borough Council
366. Sheffield City Council
367. Shelter
368. Shropshire County Council
369. SITA SUEZ
370. Slough Borough Council
371. Society of District Council Treasurers (SDCT)
372. Soho Housing Association
373. Solihull Metropolitan Borough Council
374. Somerset Strategic Housing Partnership
375. South Buckinghamshire District Council
376. South Cambridgeshire District Council
377. South Derbyshire District Council
378. South Downs Joint Committee
379. South East England Regional Assembly

380. South Gloucestershire District Council
381. South Holland District Council
382. South Housing Market Area, West Midlands
383. South Lakeland District Council
384. South Norfolk District Council
385. South Shropshire District Council
386. South Staffordshire District Council
387. South Staffordshire Housing Association
388. South Tyneside District Council
389. South West Regional Assembly
390. South Worcestershire Joint Core Strategy
391. South Yorkshire Housing Association
392. Southampton City Council
393. Southend on Sea Borough Council
394. Sovereign Housing Group
395. Spelthorne Borough Council
396. Sponge (sustainable development NGO)
397. Sport England
398. St Mowden Properties plc
399. St Paul's Unlimited Community Partnership
400. Staffordshire and Stoke-on-Trent Planning Forum
401. Staffordshire Local Government Association
402. Staffordshire Moorlands District Council
403. Stevenage Borough Council
404. Stockton on Tees Borough Council
405. Stoke-on-Trent City Council
406. Stroud District Council
407. Stroud District Green Party
408. Suffolk Coastal District Council
409. Sunderland City Council
410. Sundon Parish Council
411. Supporting People East Region Group
412. Surfaid International
413. Surrey County Council
414. Surrey Green Party
415. Swale Borough Council
416. Swan Housing Group
417. Swindon Borough Council
418. Swindon Labour Group
419. Tadworth and Walton Residents Association
420. Taylor Wimpey UK Ltd
421. Teignbridge District Council
422. Telford & Wrekin District Council
423. Tenant Advisory Panel
424. Tenants of West Norfolk
425. Tendring District Council
426. Tesco plc
427. Test Valley Borough Council

428. Tewkesbury Borough Council
429. Thames Valley Police Authority
430. Three Rivers District Council
431. Tonbridge and Malling Borough Council
432. Town and Country Planning Association (TPAS Cymru)
433. Town and Country Planning Association (TCPA)
434. Trades Union Congress (TUC)
435. Trafford Metropolitan Borough Council
436. Traveller Law Reform Project
437. Trowers & Hamlins
438. Tunbridge Wells Borough Council
439. UK Business Council for Sustainable Energy
440. UK Coal
441. UK Co-housing Network
442. UK Green Building Council
443. Union of Construction, Allied Trades and Technicians (UCATT)
444. UNISON
445. UNITE
446. University of Birmingham
447. University of Nottingham
449. University of Salford
449. Urban Living Housing Market Renewal Pathfinder
450. Uttlesford District Council
451. Vicinity Housing Group
452. Wakefield and District Housing Association
453. Warrington Borough Council
454. Warwick District Council
455. Warwickshire County Council
456. Water UK
457. Watford Borough Council
458. Waverley Borough Council
459. Wealdon District Council
460. Wellingborough Borough Council
461. West Berkshire District Council
462. West Dorset District Council
463. West Housing Market Area Partnership
464. West Kent Partnership
465. West Lancashire District Council
466. West Midlands Planning and Transportation Sub-Committee
467. West Midlands Police
468. West Midlands Regional Assembly
469. West Midlands Rural Affairs Forum
470. West Sussex County Council
471. West Wiltshire District Council
472. West Yorkshire Housing Partnership
473. Westminster City Council
474. Weymouth and Portland Borough Council
475. Wharf Land Investments

476. Whitefriars Housing Group
477. Wickham Affordable Housing Group
478. Wigan Metropolitan Borough Council
479. Wildlife Trusts
480. Winchester City Council
481. Wirral District Council
482. Woking Borough Council
483. Wolverhampton City Council
484. Woodland Trust
485. Worcestershire County Council
486. WWF-UK
487. Wycombe District Council
488. Wyre Borough Council
489. Yorkshire & Humberside Housing Forum
490. Yorkshire and Humber Association of Civic Societies
491. Yorkshire Building Society
492. Yorkshire Rural Community Council
493. Your Homes Newcastle
494. Zurich Municipal plc

Twenty seven individuals also responded. These included:

- A. Ann Milton MP (Guildford)
- B. Caroline Lucas MEP (South East of England)
- C. Cllr Colin Strong (Spelthorne)
- D. Hugh Bayley MP (City of York)
- E. Cllr Ian Beardsmore (Middlesex County Council)
- F. Jeremy Corbyn MP (Islington North)
- G. Cllr John Lines (Birmingham City Council)
- H. Cllr Leonie Cooper (London Borough of Wandsworth)

together with 19 private individuals.